

AO 91 (Rev. 11/11) Criminal Complaint

**FILED**

UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

for the

District of New Mexico

MAY 19 2016 *lv*

United States of America

v.

Jeremy L. Lara  
DOB: 2/1980

Case No.

**MATTHEW J. DYKMAN**  
**CLERK**

*16 mj 2331*

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 19, 2016 in the county of Sandoval in the  
District of New Mexico, the defendant(s) violated:

*Code Section*

18 USC 1708

*Offense Description*

theft or receipt of stolen mail matter generally

This criminal complaint is based on these facts:

See the attached affidavit

☒ Continued on the attached sheet.

*B. Specht*

*Complainant's signature*

B. Specht US Postal Inspector

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 5-19-16

*Kirtan Khalsa*

*Judge's signature*

City and state: Albuquerque, NM

US Magistrate Judge Kirtan Khalsa

*Printed name and title*

AFFIDAVIT

UNITED STATES DISTRICT COURT            )  
   )  
   )       SS  
 DISTRICT OF NEW MEXICO                )

I, Brad Specht, having been duly sworn, hereby depose and state as follows:

1. I am a duly authorized Postal Inspector with the United States Postal Inspection Service and have been so employed since February 2012. I am currently assigned to the US Postal Inspection Service, Phoenix Division, Albuquerque, New Mexico Domicile.
2. This affidavit is made in support of a complaint against Jeremy L. Lara, in connection with an investigation into violations of the following federal criminal statute: Title 18, United States Code, Section 1708, theft or receipt of stolen mail matter generally. This affidavit does not contain all information known me; rather, it contains information necessary to establish probable cause for the violations charged.
3. On May 19, 2016, I was contacted by a Confidential Source who stated Jeremy Lara and two other individuals were in the area of Unser and McMahon and were in progress of stealing United States Mail from Neighborhood Delivery Collection Box Units (NDCBUs). The U.S. Postal Service utilizes NDCBUs to deliver mail to a number of residences in a single secured enclosure; these boxes are sometimes referred to by the public as community mailboxes. The source provided a description of the vehicle stating it was a blue and silver Dodge Ram 1500 truck.
4. Postal Inspector C. Smith and I responded to the area and began surveillance of a vehicle matching the description of a blue and silver Dodge Ram 1500 truck, with three individuals including one that matched the description of Jeremy Lara.
5. Surveillance of the vehicle described above lead us to an NDCBU located at 1283 Mirador Loop Rio Rancho, NM. As Inspector C. Smith and I approached the vehicle Inspector Smith witnessed Jeremy Lara, with mail in his hands, directly in front of the NDCBU with both of the main doors open as well as the smaller door utilized to access the NDCBU by USPS Arrow Key. Inspector Smith witnessed Mr. Lara drop the mail in his hands and proceed to move towards the open passenger side front door of the truck. I witnessed a female passenger was seated in the back seat of the truck and a male driver was moving towards the open driver's door of the truck. All occupants of the vehicle were detained.
6. The driver of the vehicle, Freddie Sedillo, Jr, provided consent to search the vehicle. Inside the cab of the truck a number of pieces of mail were located listing an address of Mirador Loop. Also found inside the cab of the truck was a counterfeit USPS Arrow Key. None of the occupants of the truck reside on Mirador Loop in Rio Rancho, NM and none the mail recovered appeared to be addressed to anyone associated with the truck.
7. Mr. Lara was transported to the Rio Rancho Police Department office where Inspector Smith and I interviewed him. After being advised of his Miranda Rights Mr. Lara agreed to speak with us and admitted to stealing mail on two occasions on May 19, 2016, the one where he was arrested and one additional location. Mr. Lara also stated he had counterfeited USPS Arrow Keys in the past utilizing a template he found online. Mr. Lara stated he believed that they stole mail from three to four community mailboxes in total on May 19, 2016. Mr. Lara also stated he was homeless, had no permanent address and was staying at various places including his mother's home, and his girlfriend's uncle's trailer.
8. The female passenger of the truck was identified as Monique Cotto. Ms. Cotto was transported to the Rio Rancho Police Department office where Inspector Smith and I interviewed her. Ms. Cotto was advised of her Miranda Rights and agreed to speak with us. Ms. Cotto stated she was the

girlfriend of Mr. Lara and was currently pregnant with his baby. She stated they went to approximately two to three community mailboxes on May 19, 2016. She stated Mr. Lara would exit the vehicle at the community mailbox, bring mail back to the truck and place it in a bag in the back seat of the truck.

9. Based on the information provided in this affidavit, I believe there is probable cause to believe that Jeremy L. Lara, committed a violation of Title 18, United States Code, Section 1708, theft or receipt of stolen mail matter generally.



Brad Specht, Postal Inspector

Subscribed and sworn to before me on this the 19th day of May 2016.



Hon. Kirtan Khalsa  
United States Magistrate Judge